TRW

April 15, 1981

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APR 23 1981

DISTRICT 3
WATER QUALITY DIV.

Department of Natural Resources
State Office Building
350 Ottawa Avenue, N.W.
Grand Rapids, Michigan 49503

US EPA RECORDS CENTER REGION 5
487766

Attn: James M. Turek

UPDATE OF TRW's POLLUTION INCIDENT PREVENTION PLAN (P.I.P.P.) APPROVED 5/1/74:

This letter will serve as our revised P.I.P.P. #12160 - attached is a diagram of our facility (page 5), and a diagram showing the location & amounts of hazardous materials (page 6).

The Portland Plant (TRW) does not discharge directly into any surface waters. In the construction of the Treatment Plant all industrial waste was routed directly into one of two 200,000 gallon holding tanks prior to going into the Treatment Facility. Taking into consideration that an overflow might occur from these tanks, a large pipe was extended between the two tanks as a precautionary measure to prevent any such overflow.

After leaving the Treatment Facility and passing through the Clarifing System, consideration was given to allow for all treated material to pass through a series of (3) man-made ponds before releasing back into the ground, feeling this would allow for spills of any nature to be caught within the first pond and contained.

If for any unforseen reason a rupture of either holding tank should occur, the waste water coming from the Lift Station will be switched directly to the other tank. The landscaping of this total area will allow the flow of the spill to flow downhill into our pond system.

We feel that even though we have a minimum of critical material used in this plant, that due to all our floor drains being routed into the Treatment System, that any accidental spill or dumping that should occur, will automatically end up in our Treatment System, which is an automatic safety valve for any possible spills. This, we feel, is an excellent Incident Pollution Prevention Plan.

All of our downspouts from the roof, carrying rainwater, are not routed into the Treatment System but are contained in tiles and routed directly to the first pond. There are no critical materials stored or used on the roof. We felt that there were no pollutant materials coming from the downspouts and that it would be extremely costly to route the rainwater directly to the Waste Facility and treat.

To the best of our knowledge, we have had no incidents of spill since our Waste Treatment System has been in effect. We have used extreme care in making sure that our preventative measures and our chain of command are the very best to allow for quick action in case of problems.

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AREA CODE 517 • TELEPHONE 647-4121

have a fully trained person that oversees the system and spends his time in the treatment area. He has been instructed to take immediate action if problems should occur. He works directly with the Maintenance Department and has the authority to get any assistance required as a prime objective in this plant. He also has been instructed to keep records of all problems that occur in the facility.

Most of the critical mechanical equipment within the facility has been duplicated to cover for any breakdown that might occur within the system.

Taking into consideration that power failures may occur within the system, we have installed a pneumatic operated automatic shutoff valve. This valve will stop all flow into the clarifier in the event of a power failure. Again, as an added backup, we have the capability of catching any spills in the first pond and pumping them back into the initial system.

We have available a State Approved Licensed Hauler within the area that will give us immediate assistance upon request.

To allow for communications in a chain of command, TRW Portland has placed the following names in order for the Pollution Emergency Contact List:

1. Gary Hattis - Certified Operator - TRW Portland Plant
   902 Lyons Road
   Portland, Mi. 48875
   Phone (517) 647-4121 - Ext. #281
   Home Phone (517) 647-6970

2. M. Fedewa - Maintenance Foreman - TRW Portland Plant
   902 Lyons Road
   Portland, Mi. 48875
   Phone (517) 647-4121 - Ext. #280
   Home Phone (517) 647-4071

3. D. Young - Plant Supt. TRW Portland Plant
   902 Lyons Road
   Portland, Mi. 48875
   Phone (517) 647-4121 - Ext. #270

The following list of names will serve as their emergency contacts:

1. Grand Rapids District Office (616) 456-6232
   Mike Beck, Acting District Engr. - home phone (616) 949-6118

2. Pollution Emergency Alert System (P.E.A.S.)
   Tool-free 24 hour phone number - 1-800-292-4706

3. National Response Center U.S. E. P. A. - 1-800-424-8802

The Grand Rapids office will be called to report ANY significant spill within the plant. Any spill to the surface or groundwaters would be reported to P.E.A.S. and any spill into navigable waters would be reported to the National Response Center.

I.P.P. IN REGARD TO P.C.B.

We have just one piece of equipment in our plant that containes PCB. This is an ITE 2000 KVA transformer containing immersed Askarel. The transformers capacity is 465 gallons. As near as we can determine the Askarel contains approx. 60% PCB or 279 gallons. (for reference we contacted ITE Imperial in Detroit and Monsanto Enviro-Chem. Systems)

The transformer is located in a cement block room that has 4" curb in all openings and doorways. This will allow for containment of a spill capacity of 934 gallons and is sufficient to handle any spill that might occur in this area. The area is locked to keep out all unauthorized personnel and has two signs posted by the area indicating that the transformer contains PCB.

If leaks or spills occur, the PCB-containing liquid will be absorbed with rags, floor dry, or other appropriate materials. The surfaces affected will be cleaned with appropriate solvents. The rags, mops, absorbants used, and any clothing comtaminated by PCB's will all be placed in sealed, labeled containers.

The sealed containers will be removed by a licensed PCB wastehauler to a landfill approved for solid PCB disposal or if rugulations so require, the containers will be taken to an approved incinerating facility. (The name and address of the licensed wastehauler and the approved landfill is shown below.)

If the transformer is disposed of, it will be drained and rinsed three times with a suitable solvent. The liquid and solvent used will be converted to solid form by mixing with absorbants, cement, etc., and taken in a sealed, labeled container to an approved landfill or incinerating facility, whichever regulations may require at that time.

LICENSED PCB WASTEHAULER	APPROVED LANDFILL
Central Maintenance Co. Inc.	CECOS Int'l. Inc.
5625 VanBorn Ct.	5092 Aber Road
Dearborn Hts., Mi. 48125	Williamsburg, Ohio 45176

P.I.P.P. IN REGARD TO METHANOL DELIVERIES may not put in.

The methanol tank will be underground and the fill pipe will be located inside a fenced area which will be locked for security reasons.

This tank will be filled once a year under the surveillance of our Security officer who will guard against mishaps occurring.

The tank will have a level gage visible to the truck driver and our security guard which will be an aid in preventing spills due to overfilling.

In the event of a spill the methanol will be absorbed with rags, floor dry or other appropriate material and properly disposed of.

P.I.P.P. IN REGARD TO DRUMMED MATERIAL

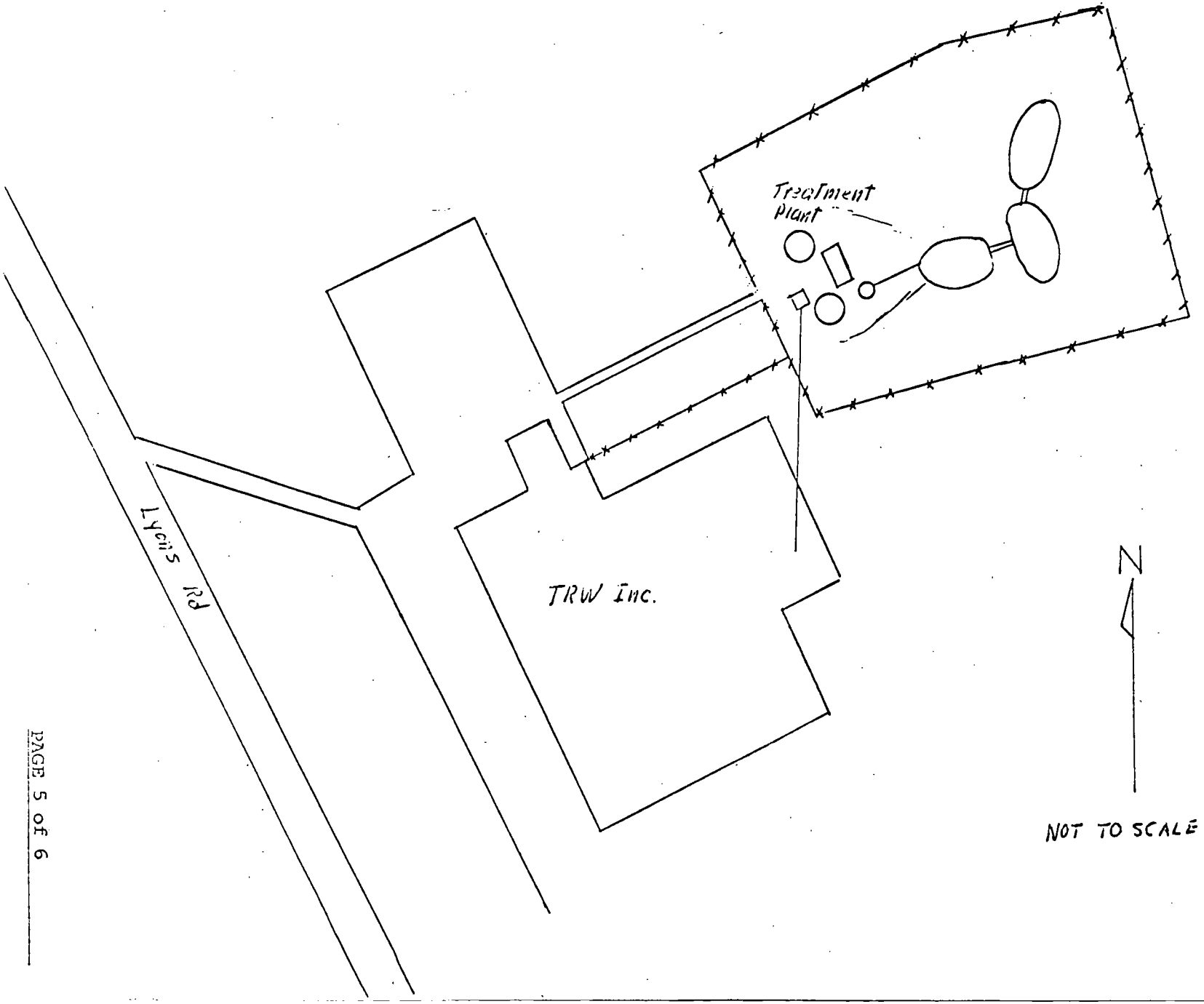
Drummed material is unloaded with lift trucks by TRW personnel. In the unlikely event that a barrel would spill, the contents will be absorbed by rags, floor dry or other appropriate material and properly disposed of.

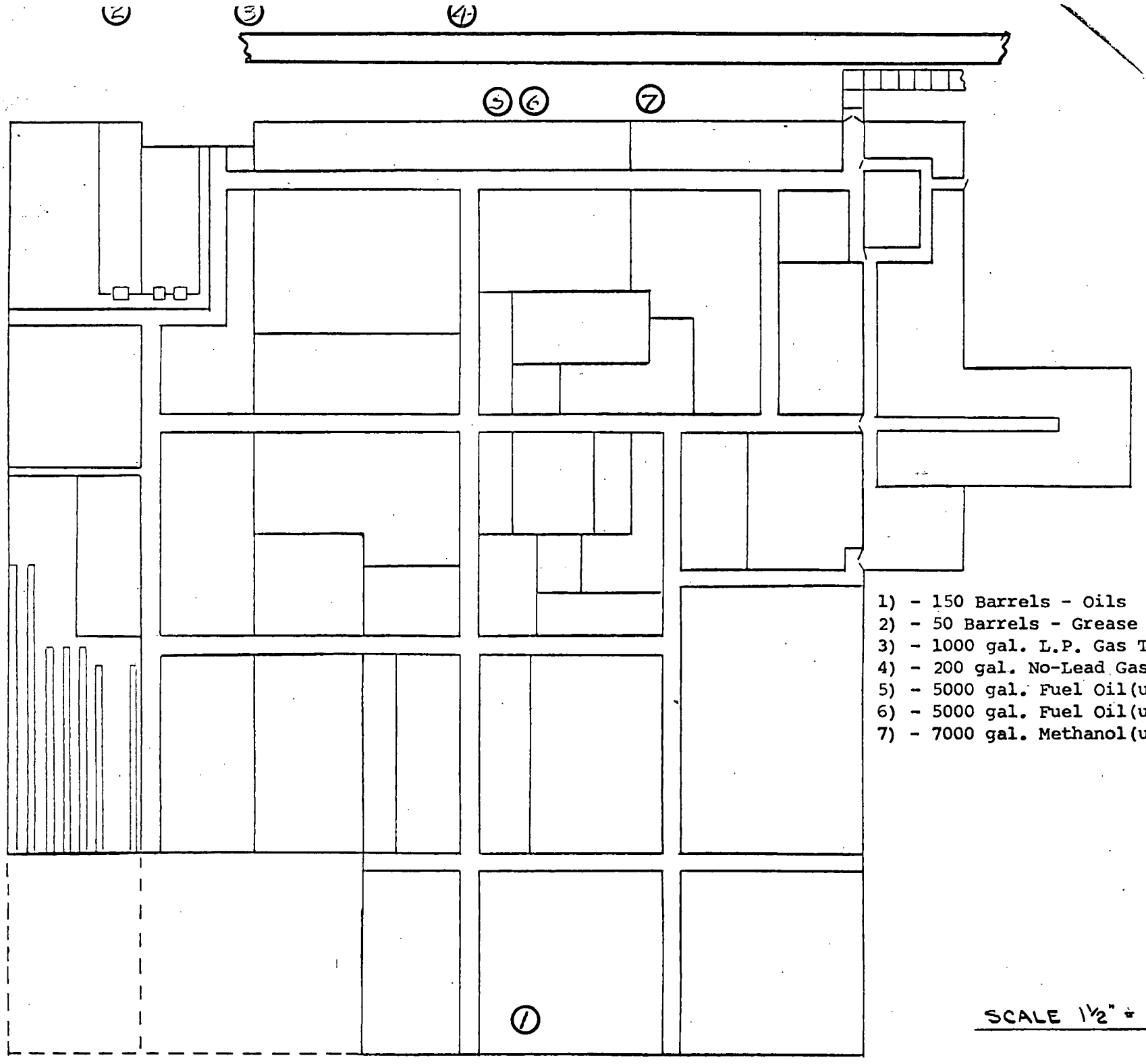
Keith Patterson, Mgr.
Industrial Engineering
TRW - Michigan Division
Portland Plant
902 Lyons Road
Portland, Michigan 48875

(517) 647-4121 - Ext. #240

cc: L. Kipp
D. Young
R. Babbitt
M. Fedewa
G. Hattis

TRW Inc Portland, Mich





1) - 150 Barrels - Oils
2) - 50 Barrels - Grease
3) - 1000 gal. L.P. Gas Tank
4) - 200 gal. No-Lead Gas Tank
5) - 5000 gal. Fuel Oil(underground)
6) - 5000 gal. Fuel Oil(underground)
7) - 7000 gal. Methanol(underground)

SCALE 1½" = 100'

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June 8, 1981

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JUN 16 1981

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Attn: James M. Turek

ADDENDUM TO UPDATE OF TRW's POLLUTION INCIDENT PREVENTION PLAN (P.I.P.P.) APPROVED 5/1/74 - UPDATE DATED APRIL 15, 1981.

P.I.P.P. IN REGARD TO METHANOL DELIVERIES (Ref. Page 3 of 6 on revised P.I.P.P. dated April 15, 1981)

We will keep a monthly log of the methanol usage by checking and recording the liquid level each month. The line pressure will also be checked and recorded each month to aid in determining if any leaks have occurred in the lines or in the underground tank.

A yearly pressure test will be performed on the tank itself to guard against underground leaks.

The cathodic corrosion protection system will also be monitored on a yearly basis as an added safeguard against tank failure.

Keith Patterson/jam

Keith Patterson, Mgr.
Industrial Engineering

cc: J. Russman

KP:jam

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